

1 **ROBERT M. SCHRANK, OSB # 853252**
2 **220 E. 11th Avenue, Suite 7**
3 **Eugene, Oregon 97401**
4 **541-485-2214**
5 **Facsimile: 541-735-3923**
6 **E-mail: *shrankster@aol.com***
7 **Attorney for Defendant**
8 **Susan Frances Graves**

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

11 **UNITED STATES OF AMERICA,**)
12)
13 **PLAINTIFF,**) **16 CR 00129 MC**
14 **v.**) **DEFENDANT'S SENTENCING**
15 **SUSAN FRANCES GRAVES,**) **MEMORANDUM**
16 **DEFENDANT.**)

18 Defendant, Susan Frances Graves, submits this Sentencing Memorandum for the
19 Court's consideration at her sentencing, presently set for October 13, 2016 at 10:30 a.m.
20

21 **HISTORY**

22 Ms. Graves is 41 years old. She was born in Coos Bay, Oregon, and graduated
23 from Sheldon High School in Eugene, Oregon in 1992. During high school, she was an
24 athlete participating in the varsity ski team and dance team, and she lettered in varsity
25 track for 4 years. She has never been married. She has two adult children, a daughter
26 aged 18 and a son, 21. Both are employed full time and doing well.
27

1 Ms. Graves had a reasonably healthy and happy upbringing. She was well
2 provided for and her parents were loving and supportive. Her father was a very
3 successful self-employed contractor and a volunteer fire fighter; her mother did not work
4 outside the home. Her parents are both retired and now live in Arizona. Ms. Graves has
5 one sibling, a sister who also lives in Arizona.

7 Ms. Graves' relationship with her parents is better now that she has been drug free
8 and actively involved in ongoing treatment. They have been very supportive of her
9 current efforts and are anxious to have a more normal relationship with their daughter.
10 Ms. Graves' relationship with her sister has suffered because of her drug use, but Ms.
11 Graves is determined to improve that relationship in the future.

13 Ms. Graves began struggling with drug addiction following high school, and she
14 continued to struggle with drug addiction and anxiety and depression throughout her
15 adult life. This struggle is ongoing today. It has interfered with all of her relationships,
16 including her children, and her ability to function as a healthy, productive person. She
17 recognizes this and fully acknowledges the damage her actions have caused. She is
18 taking charge of her life; she is taking responsibility for her actions, participating in
19 ongoing treatment, making positive changes, developing healthy relationships, and is
20 dedicated to a drug free and productive future.

22 Ms. Graves has read the Presentence Report and has no additions or corrections to
23 the Report. She has also read the Government's Sentencing Memorandum and agrees
24 with the recitals therein.

25 Attached to this Sentencing Memorandum for the Court's consideration are letters
26 written on behalf of Ms. Graves.
27

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

CONCLUSION

Based upon the foregoing, the attached letters, and other information provided to the Court, and the factors listed in 18 U.S.C. §3553(a), it is respectfully requested that the Court grant a variance and sentence Ms. Graves to 41 months.

Respectfully submitted this 10th day of October, 2016.

_____/s/_____
ROBERT M. SCHRANK, OSB # 853252
Attorney for Defendant
Susan Frances Graves

CERTIFICATE OF SERVICE

I hereby certify that I caused to be served the foregoing DEFENDANT'S SENTENCING MEMORANDUM on the following named individual(s) on the 10th day of October, 2016:

Jeff Sweet
Asst. U. S. Attorney

By filing the document through the U. S. District Court of Oregon's CM/ECF website in accordance with FRCP 5(b)(2)(D).

DATED this 10th day of October, 2016.

_____/s/_____
ROBERT M. SCHRANK, OSB #853252
Attorney for Defendant Susan Frances Graves

To Whom It May Concern,

I am writing this letter on behalf of Susan Graves. I do want to say that I reached to Susan and offered to write this. I am happy that she reached back out to me because I believe if anyone can make the most of an opportunity it's Susan.

I met Susan at Forrest Technical Coatings. I was the company's Purchasing Manager and we were looking to fill a vital support role under my supervision. I didn't know Susan yet, as she had been working in a different area of the company, but she came highly recommended from another person within the company. In short time I realized why. Susan was highly intelligent and caught onto her new responsibilities extremely fast. She worked in a position in which she got pulled in many directions at the same time, and had many demands placed upon her. I have seen Susan deal with some very difficult circumstances and some very stressful situations with a level head. She continued to have additional tasks placed before her because she was so efficient, and she took each one on with a sense of pride and responsibility that was rare to see in my 19 years at Forrest. She showed up for work each day ready to go and stayed until the job was done, regardless of the time it took.

The most impressive part about Susan though was who she was as a person. She was honest, kind, compassionate, and working hard to create a better future for herself and her kids. She had the qualities that you look for in not only a coworker, but a friend as well. She was an excellent listener and also was good at giving advice without criticism. Susan talked nonstop about her kids and was excited to be repairing her relationships with them. I really saw her drop everything for her kids and they were definitely front and center of all she did. She even brought her youngest, Valerie, to work one day on Take you Daughter to Work Day. I was very impressed by Valerie and really the way they interacted together. I really enjoyed my time at work more with Susan in the office, and to this day she remains one of my favorite coworkers in all my years of employment!

I worked, over my 19 years at Forrest, with many people in various stages of addiction. In various stages of life. As a company, we were very open to working with and helping support many people coming out of the penal system as well as many struggling with addictions. Some made it, some didn't. I can say out of the many of coworkers I had in these situations, Susan was the best to work with and I believe she had the highest character of them all. She was very open about her choices and always took responsibility for her decisions. I never heard her use excuses and from what I knew about her past, she easily could have. She was doing her best to learn from each decision she had made and to grow herself as a person, mother, and daughter.

I have no idea what Susan's current legal situation is. I honestly don't care because it won't define who I know her to be as a person. What I do know is that Susan is someone with a bright future. She is not perfect, she makes mistakes, she makes poor choices sometimes. I believe she learns from each one of them though and to me, that is hugely important. I have been asked to write letters like this before for co-workers in similar situations and have had to decline...but like I said, I actually let Susan know that I would be happy to do so should she ever need it. If Susan has the opportunity, I believe she will make the most of it...to continue to better herself as a person, to better herself as a member of her family, and to have a positive impact on the community in general.

I am happy to talk in person to answer any more direct questions, and I hope you give it some consideration.

Thank you for taking the

Sincerely,

Brooke Couture



350 East 11th Avenue | Eugene, OR 97401
(541) 683-1641 | Fax: (541) 681-3294

September 16, 2016

US Federal District Court
405 E 8th Ave, Eugene, OR 97401

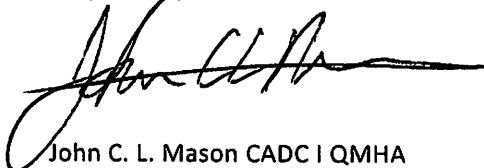
RE: Susan Graves,
Dear Your Honor;

I have been counseling Ms. Graves since October 20th, 2015.

As Ms. Graves has progressed through treatment at Chrysalis I have witnessed her change from blaming the system and having resistance to changing her thinking patterns and behaviors to being accountable and wanting more from her life. She has expressed honesty, resilience, and accountability during our counseling process. She has held a job and continued in recovery even though she knows she is going to prison in the future. She has improved her ability to set boundaries for herself and with others by thinking about outcomes and developing a healthy support system. Ms. Graves has earned a certificate of completion for Chrysalis Behavioral Health, and is choosing to return for after care when she completes her sentence.

If you have need for further information contact me at (541)-683-1641, Fax 541-681-3294 or email me at masonj@whitebirdclinic.org.

Respectfully,

 CADCI QMHA

John C. L. Mason CADCI QMHA

Substance Abuse Counselor

Chrysalis
Certificate of Completion

This Certifies That

Susan Graves

has successfully completed all requirements of the
Chrysalis Drug-Free Treatment Program as of
September 16th, 2016 *and is hereby awarded this*
certificate in recognition of their achievement.

John Miller *CADD I QMHA*
Counselor

Debra Sue
Clinical Supervisor



**Lane County Administration
Parole & Probation**

75 West 5th Ave Eugene, OR 97401
Phone (541) 682-3040

October 3, 2016

To Whom It May Concern:

I have been Susan F. Graves Probation Officer since May 5th, 2015. Since I have known Ms. Graves she has struggled with her drug addiction. She has been in and out of treatment and had odd jobs off and on. Even throughout the difficult times she maintained contact with me and never stopped trying to get clean.

March of 2016 she re-engaged in treatment with Chrysalis and got a full-time job working at Motel 6. This is when I started seeing a positive change in Ms. Grave's attitude and demeanor. Even though she is facing severe consequences for new charges she continues to improve her life with treatment and taking responsibility for her actions. Ms. Graves completed treatment with Chrysalis September 16th, 2016 and has been drug-free since March 2016 and continues with one on one counseling. She is still employed full-time at Motel 6 and is appearing for court as directed.

Many people in this situation would have given up knowing that their future involves going to prison. I must commend Ms. Graves for maintaining an optimistic attitude and for her follow through in treatment and her employment. This letter is to summarize the constant improvements that she has made over the last seven months. She has a great start towards a clean and sober future and maintaining as a positive member of society.

Sincerely,

A handwritten signature in cursive script that reads "Keri Nelson".

Keri Nelson
Lane County Parole and Probation

To whom it may concern:

Susan has work for me since approximately March of 2016 to current. Susan started at part time but quickly moved to full time. Susan did this by being available and willing to work any shift. She is professional with guests and has improved her customer service scores from a 8.3 to a 9.4 which is very difficult to do in the Hospitality Industry.

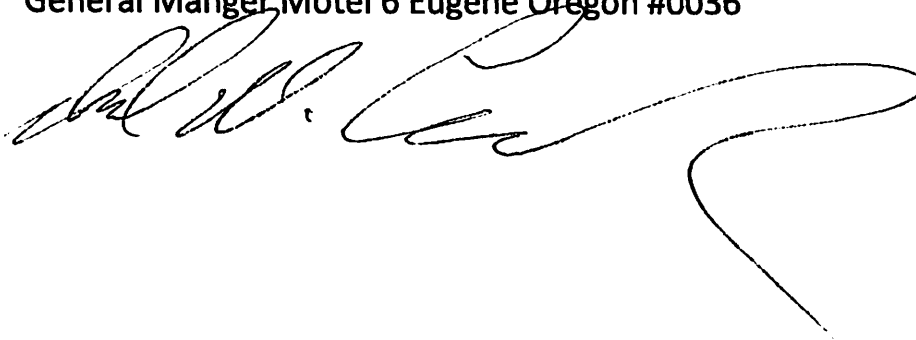
Susan is reliable, dependable and is always on time for her shifts and is liked by her co-workers and guests. Susan has been a valuable asset to the team here and we hope she will be allowed to continue her work ethic and obvious efforts to turn her life around in a positive and productive way.

Susan will have a job here until as she has earned the respect of the location.

Sincerely,

David W. Curtis

General Manager Motel 6 Eugene Oregon #0036

A handwritten signature in black ink, appearing to read 'David W. Curtis', with a long, sweeping horizontal stroke extending to the right.

10/4/2016

Re: Susan Graves

To Whom it May Concern:

I have known Susan for some time now and have found her to be an honest and conscientious person. I understand that she does have a history but I, personally, have found her to be someone who is doing everything she can to turn her life around.

My experience with Susan has been nothing but positive. I have found her to be extremely hardworking, positive and supportive of others.

I have grown to respect her for her hard work in moving forward and will continue to support her efforts as she continues toward her future goals.

Thank you for your time and consideration.

Respectfully,

A handwritten signature in black ink, appearing to read 'Valerie Ahlstedt', written in a cursive style.

Valerie Ahlstedt